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PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> , ¹	§	Joint Administration Pending
	§	
Debtors.	§	Case No.: 15-31858-hdh-11

NOTICE OF HEARING ON CERTAIN FIRST DAY MOTIONS

PLEASE TAKE NOTICE, that a hearing will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **May 4, 2015 at 10:30 a.m. (CDT)**, or at such other time as the court may determine, on the following motions (collectively, the "First Day Motions"), which were filed by the Debtors in connection with the Chapter 11 Cases:

1. Application for Admission *Pro Hac Vice* for Brad B. Erens [Docket No. 3];
2. Application for Admission *Pro Hac Vice* for Joseph A. Florczak [Docket No. 4];

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (7946). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

3. Motion of the Debtors (I) for an Order Directing the Joint Administration of Their Chapter 11 Cases and (II) Waiving Certain Requirements of 11 U.S.C. § 342(c)(1) and Fed. R. Bankr. P. 1005 and 2002(n) [Docket No. 2];
4. Motion of the Debtors for an Order (I) Approving the Continued Use of the Debtors' Cash Management System, Bank Accounts and Business Forms, (II) Permitting Certain Intercompany Transactions and Setoffs and (III) Granting Related Relief [Docket No. 6];
5. Debtors' Application for an Order Authorizing the Appointment of Epiq Bankruptcy Solutions, LLC as Claims, Noticing and Balloting Agent [Docket No. 8];
6. Motion of the Debtors for an Order Extending the Time Within Which the Debtors Must File Their (A) Schedules and Statements of Financial Affairs and (B) Rule 2015.3 Reports [Docket No. 9];
7. Motion of the Debtors for an Order Authorizing Them to Pay Prepetition Employee Wages, Benefits, Business Expenses and Related Items [Docket No. 11];
8. Motion of the Debtors for an Order Authorizing Them to (I) Maintain Certain Customer Practices and (II) Honor or Pay Related Prepetition Obligations to Their Customers [Docket No. 12];
9. Motion of the Debtors for an Order Authorizing Them to Pay Certain Prepetition Taxes [Docket No. 13]²;
10. Motion of the Debtors for an Order (I) Authorizing Them to Pay Certain Prepetition Obligations on Account of Royalties, Overriding Royalty Interests, Working Interest Owner Payments and Severance Taxes and (II) Authorizing Banks to Honor and Process Related Checks and Electronic Transfers [Docket No. 14];
11. Motion for Entry of Interim and Final Orders Pursuant to Sections 361, 362, 363 and 364 of the Bankruptcy Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure (A) Authorizing the Debtors to (I) Use Cash Collateral of the Pre-Petition Secured Parties, (II) Obtain Post-Petition Financing and (III) Provide Adequate Protection to the Pre-Petition Secured Parties, (B) Prescribing Form and Manner of Notice of and Scheduling Final Hearing and (C) Granting Related Relief [Docket No. 15];
12. Amended Motion for Order Expediting Consideration of, and Shortening the Notice Period Applicable to, the Bid Procedures Component of the Debtors'

² The Debtors will seek to have this motion heard at the hearing.

Motion for Entry of Orders: (I) Establishing Bidding and Sale Procedures; (II) Approving the Sale of Assets; and (III) Granting Related Relief [Docket No. 24];

Dated: May 1, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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